

Approved: 

ORIGINAL

NICHOLAS W. CHIUCHIOLO / MONA SEDKY
Assistant United States Attorney/DOJ Trial Attorney

Before: THE HONORABLE SARAH NETBURN
United States Magistrate Judge
Southern District of New York

- - - - - x : 18 MAG . 4701

UNITED STATES OF AMERICA : SEALED COMPLAINT
:
: Violations of
- v. - : 18 U.S.C. §§
DAVID WALDMAN, : 2261A(2)(B), 875(c),
: and 2.
: Defendant. : COUNTY OF OFFENSE:
: NEW YORK
- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

ANTHONY GIATTINO, being duly sworn, deposes and says that he is a Special Agent with the United States Attorney's Office for the Southern District of New York ("USAO"), and charges as follows:

COUNT ONE

(Cyber Stalking)

1. From at least in or about March 2014, up to and including the present, in the Southern District of New York and elsewhere, DAVID WALDMAN, the defendant, with the intent to injure, harass, and intimidate another person, used the mail, interactive computer service and electronic communication service and electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, WALDMAN sent hundreds of harassing and threatening email and text message communications to the victim, sent multiple defamatory email communications about the victim to the victim's employer, and created and posted harassing and threatening website blog posts about the victim.

(Title 18, United States Code, Sections 2261A(2) (B) and 2)

COUNTS TWO THROUGH FIVE

(Interstate Threats)

2. On or about the dates set forth below, in the Southern District of New York and elsewhere, DAVID WALDMAN, the defendant, willfully and knowingly, did transmit in interstate and foreign commerce communications containing threats to kidnap and injure the person of another, to wit, WALDMAN, sent emails to a victim and created and posted blog posts about the victim, that contained threats to kidnap and injure the victim.

(Title 18, United States Code, Section 875(c) and 2)

Count Number	Type and Approximate Date(s) of Electronic Transmission in Interstate or Foreign Commerce
2	Email message on April 8, 2014, using the account "drwesq@gmail.com"
3	Blogspot post on July 20, 2014, using the account nycitysux.blogspot.com

Overview

3. As set forth in greater detail below, DAVID WALDMAN, the defendant, has engaged in a long-term and pervasive campaign of harassment, intimidation, and threats directed at an individual (the "Victim") who dated WALDMAN for approximately four months in 2013 and 2014. As discussed in further detail herein, WALDMAN sent hundreds of email and text message communications to the Victim, and created "blogspot"¹ pages, of

¹ Based on my participation in this investigation, including my review of documents obtained from the Victim, I am aware that the primary email and blog accounts used by the defendant in furtherance of his commission of the crimes alleged in Counts One through Three of this Complaint, were Gmail and Blogspot, respectively. Based on my training and experience, I am aware that Gmail is an email service that is operated by Google, Inc. and Blogspot is a blogging service that is also operated by Google, Inc. Google is headquartered in Mountain View, California, and operates several data center servers throughout the United States, but not in New York.

which the Victim was the subject. Through these communications and blog posts, WALDMAN complained about the breakup, described the various psychiatric medications he was taking, threatened to (and later did) contact the Victim's parents and employer, demanded that the Victim have sex with him, and threatened various acts of violence on the Victim.

The Victim

4. Based on my participation in this investigation, including my conversations with the Victim, I have learned that the Victim and DAVID WALDMAN, the defendant, met through an online dating website in November 2013. They dated for approximately four months—until March 2014, when they broke up.

The 2014 Emails and Text Messages to the Victim

5. Based on my participation in this investigation, including reviewing documents and interviewing the Victim, I have learned, among other things, the following:

a. In the wake of the breakup, DAVID WALDMAN, the defendant, sent hundreds of email messages, text messages, and voicemail messages to the Victim. For example, on or about April 8, 2014, using the account "David.Waldman@gardencitygroup.com," WALDMAN sent the Victim an email stating, in part: "I get we are broken up. I get now, to my utter sorrow, that you have no desire for a friendship in the future . . . Anyway, wachtel [apparently Waldman's psychiatrist] ordered me to not contact you I am fine with that . . . for the most part. . . [L]ast time you will hear from me. doctors [sic] orders. . . ." WALDMAN signed the email, "David."

b. On or about April 8, 2014, using the account "drwesq@gmail.com," an account that is controlled by WALDMAN, see ¶¶ 14-16, *infra*, WALDMAN sent the Victim an email with the subject line "fuck faced fucker," stating, in part:

where are you and when will you be back in my life? i am not a patient man. . . . i have tried every tact i know of to get you to have contact with me. i am running out of options. i am not too proud to show the fuck up at your apartment unannounced. . . . i am crazy enough to do it, too. you should know that. I am not playing around anymore. [...] what i won't deal with, and will not accept, is you out of my life . . . you are the

devil. . . . not sure how much more of this i can take before i go haywire and bananas and show up at your apartment in the middle of the night or at your new job if you have one. trust me - i will do it. ill [sic] give you another week or so of this shit. then my limit will be reached. i am stubborn, i am determined and i am committed. we can do it the easy way, or the hard way but the end result will be the same...you will be back in my life. dont [sic] know in what capacity, but you will be back in it. women like you come around once, twice. maybe three times in a lifetime. that means you are rare. and valuable. and something to be kept and cherished. and cherished can mean held hostage and bound and gagged inside my apartment. you will be well fed and cared for, i assure you, but do you really think you will have fun? [...] begin preparing for the inevitability now [first name of the victim] or take the easy route...just get in touch with me. like i said, i have about another week left in me. after that, its [sic] bound and gagged time. word. You really are a stubborn cuntish cunty cunt. you sure new York death wasn't for you? as of the past week, you seem to be a model new york death employee. bitch ass ho.

The email was signed, "David."

c. Also on or about April 8, 2014, using the same account, "drwesq@gmail.com," WALDMAN sent the Victim an email with the subject "please jukebox," stating, in part: "Did u love me so much i utterly crushed you? Either way, i am contacting [the Victim's father's name] tomorrow. I have no choice. [...] I will tell [the Victim's father's name] that I am forced to get an std test because his daughter apparently cant [sic] keep her pants on. Ill [sic] forward him your lingerie too. Im [sic] nuts enough to do it. Noone [sic] ignores me and treats me as if i am nothing who doesnt [sic] matter or mean anything. [...] [the Victim's father's name] will like agent provocateur lingerie."

d. On or about April 9, 2014, using a telephone number that is registered to "David Waldman" (the "Waldman Cellphone Number"),² WALDMAN sent the Victim a text stating,

² Based on my review of subscriber information obtained pursuant to a subpoena from the cellphone service provider for the Waldman Cellphone Number, I am aware that the Waldman Cellphone Number is registered to "David Waldman."

"Stop igmoring [sic] me and shuttimg [sic] me out. Im about to leave wotk [sic] and drive to your apartment."

e. On that same date, on or about April 9, 2014, WALDMAN, using the account "David.Waldman@gardencitygroup.com," sent the Victim an email with the subject line "why cant [sic] you just tell me you dont [sic] want my friendship," WALDMAN stated, "I am coming over tonite [sic] when I leave work. I deserve proper closure. . . ."

f. That same night, WALDMAN sent the Victim a series of text messages, using the Waldman Cellphone Number, stating,

Im [sic] coming over tonite [sic] for a hug and some free sodas. Don't bother saying you don't love me...you do. We are in love. And i am NO quitter. [...] Did u make other plans for ur birthday yet? If not, i had planned something and i want you for it. Do i get it? Or u wanna still play cunty cunt cunt? . . . [I] am here. Are you really not home? Did you really make me come here for nothing? Why are you doing this to me?. . . Why are you trying to make me want to die?. . . Do you want me dead like [first name of victim's ex-boyfriend]? . . . I am not doing well. Th8nking [sic] if [sic] taking 100 xanax. . . .

g. That same evening, the Victim also received a text message from a different cellphone number stating, in part: "I'm coming over tonite after work for proper closure. . . . I must have you this weekend. I need to fuck and love you one last time. I promise you will enjoy it." The text message was signed, "DW."

h. The next day, on or about April 10, 2014, using the account "David.Waldman@gardencitygroup.com," WALDMAN sent the Victim an email stating, in part: "I cannot believe you changed your locks and are frightened of me and felt you had to hide from me with [first name of friend of the Victim] or asshole. I would never want to cause you harm [W]hat was it about me that made you afraid that I would hurt you? [I]f it was from how psychotic ive been last week"

i. On or about April 21, 2014, using the account drwaldmanesq@gmail.com, an account controlled by DAVID WALDMAN, the defendant, see ¶ 17, infra, WALDMAN sent the Victim

an email message stating, "Cops are as worthless as you. Doing nada. Trust me . . . you want to get my keys and mp3 player back to me. I know where you live and I got nothing to lose. I am so tired of this. Give it up you worthless disgusting skank. You will not survive [sic] this. I swear it." About an hour later, using the same account, WALDMAN sent the Victim an email message stating, "Are you keeping my keys and mp3 player because you are obsessed with me? You cant [sic] bring yourself to return them? [First name of Victim's ex-boyfriend] and I were the loves of your life and he is dead so that leaves me? I am flattered. Truly. But you arent [sic] my type. So return my shit before things get ugly. Why are you even alive ? . . ."

j. In or about April 2014, WALDMAN mailed a letter to the Victim's parents.

The July 2014 Order of Protection Against Waldman

6. Based on my participation in this investigation, including reviewing documents and interviewing the Victim, I have learned, among other things, the following:

a. On or about April 30, 2014, the Manhattan District Attorney's Office charged DAVID WALDMAN, the defendant, with aggravated harassment in the second degree. The People of the State of New York v. David Waldman (2014NY033914). WALDMAN voluntarily surrendered in lieu of an arrest. On or about the same day, the Criminal Court of the City of New York (the "State Court") issued an order of protection, which prohibited WALDMAN from contacting the Victim through any means, including through email or social media.

b. On or about July 15, 2014, the State Court entered an adjournment in contemplation of dismissal and entered a one-year temporary order of protection against WALDMAN. This order prohibited WALDMAN from, among other things, stalking, harassing, or contacting the Victim through any means, including through electronic means, and specifically stated, "do not have any contact with the above person(s) through any third parties."

The Continued 2014 Harassing Emails to the Victim

7. Based on my participation in this investigation, including reviewing documents and interviewing the Victim, I have learned, among other things, that despite the temporary order of protection, on or about July 23, 2014, DAVID WALDMAN, the defendant, using the name "Robert Roma" and the email

account robertromma68@gmail.com, an account controlled by WALDMAN, see ¶ 18, *infra*, sent the Victim a lengthy, rambling email, with the subject line "blast from the past." In the email, WALDMAN complained that the Victim had ignored his email messages, complained that the Victim had WALDMAN arrested for stalking, referred to her as a "mental patient" and "sociopath," threatened to sue her, and complained about her other romantic relationships. WALDMAN asked the Victim who else she "fucked" and claimed that he missed her "sexually." He also wrote, "i was desiring you badly because sometimes during sex your hair hung down the front of your face and there was something absolutely magical about it." He stated, "the law should never be invited into personal shit. never. nothing good would ever come of it. you must know that." He stated, "ive [sic] already forgiven that dick detective," repeatedly begged her to contact him "please please please . . . give me call. you have nothing to lose. and since i am obviously totally obsessed with understanding your motivations . . ." He later demanded, "call me tonite . . . i want to learn about you and learn from this . . . I FUCKING LOVE KLONNIES . . . that was my third trip to jail . . . I am becoming a badass thug . . . soon, ill [sic] have street rep, yo! . . ." He closed by accusing the Victim of killing her ex-boyfriend, stating "maybe dead [first name of ex-boyfriend], too. I wonder if you sorta killed him."

The 2014 Harassing Blog Posts Targeting the Victim

8. Based on my participation in this investigation, including reviewing documents and interviewing the Victim, I have learned, among other things, the following:

a. In 2014, in addition to barraging the Victim with emails, DAVID WALDMAN, the defendant, see ¶¶ 20-23, *infra*, created a series of "blogspot" pages, with myriad lengthy posts devoted to harassing the Victim.

b. For example, WALDMAN created a blogspot called "nycitysux.blogspot.com." On June 6, 2014, using the pseudonym "Anton Phillippe Wolfgang Van Sertima," in a post entitled "Anton has made a decision," WALDMAN claimed that the Victim threatened his life and accused him of being a child molester. WALDMAN stated, "To ensure my Constitutional Rights are never again violated, and to protect my life against [the Victim], born [month and date of birth] (won't print the year . . . a gentleman doesn't mess with a woman's age . . . especially when they are [age of the Victim]), who threatened my life, I will soon be applying to the State of New York for a handgun

permit. N.B. New York does not want to ignore yet another of Anton's Constitutional Rights. . . ."

c. WALDMAN created a blogspot called "eurotrashroyalty.blogspot.com." In a post, dated July 20, 2014, entitled "Anton getting sleepy . . . but must first post!" WALDMAN stated, among other things, that the Victim was a "fucking cunt. if you were to die tonite i would actually smile. . . i hope you sweat yourself to death tonite." He later stated, "i dig on vendettas and dig on revenge. . . . i will ruin you. i will fuck up your shit to the point that your life will be unrecognizable. you must have seen some inklings of what i might be capable of during our three months together. no kyke civil attorneys, no car load of your pals, or anything else you have in your arsenal will cause me to even blink. . . . [W]hen i am wronged, i stop giving a shit about the consequences. i stop feeling fear or trepidation. i only feel what I need . . . revenge. to see suffering." WALDMAN added, "i dont [sic] like wanting you dead. but i do and it is deserved." WALDMAN's post continued, "in addition to the tears i made you cry, in addition to the breakdowns i caused, . . . i have only begun. you evil, maniacal, sociopathic evil cunt. . . . i am going to change your life for the worse. and I am going to enjoy it. and fuck the collateral damage to your family . . . i swear it. . . . I may end up going down with you, but make no mistake, your [sic] a doomed cunt." He added, "i only hope you don't die of cervical cancer before i can fuck up your shit." He continued, "i will impact your life greatly and negatively. mark my words . . . i am obsessed with fucking up your shit. and i always achieve the things i put my mind to."

d. On or about the same date and on that same blog, in a different post entitled "Vote with your feet," also by "Anton Phillip Wolfgang Van Sertima," WALDMAN repeated many of the same messages above, and added "this fucking cunt is going to pay . . . for having broke [sic] your heart and made you cry and made you feel cheap as well as the letter i wrote to your dad wherein i essentially told him his daughter is a fucked up whore. but that was only the beginning . . . [S]leep tight . . . but trust me, things are going to get worse for you."

The September 2014 Emails to the Victim's Employer

9. Based on my participation in this investigation, including reviewing documents and interviewing the Victim, I have learned, among other things, the following:

a. On or about September 8, 2014, using the email account drwesq@gmail.com, and signing it "David," DAVID WALDMAN, the defendant, sent an email to the human resources department of the Victim's employer, a major international financial institution. The human resources department forwarded the message to the Victim. It read, in part:

To Whom It May Concern,

I am writing to let you know that a relatively recent hire of yours . . . will in short order be sued for libel against me. . . .

In addition, though I admit I am certainly not unbiased and do have a proverbial axe to grind with [the Victim], you may be interested in knowing that she is a habitual drug user. I have personally seen her use marijuana on several occasions, and cocaine on two occasions, both times with a former colleague of hers from [bank].

Frankly, that is but one of many reasons I ended the relationship. I certainly do not expect you to take me at my word, but were she drug tested, I am quite certain she would come up positive. . . .

However, the facts remain that [the Victim] posted very hurtful, damaging lies about me on a blog and will be sued for defamation, as well as theft, illegal trespass, and a litany of other charges. In addition, I did indeed witness her using narcotics on several occasions while we dated for a brief period several months ago.

Thank you for your attention to this email and I do apologize for its subject

Sincerely,

David

b. On or about September 8, 2014, using the same email account, drwesq@gmail.com, and signing his name

"David Waldman," WALDMAN sent a specific representative of the human resources department a second email, with the subject "Complaint [sic] of a [bank's name] employee in New York office." The human resources department forwarded the message to the Victim. The September 8 email stated, among other things, that the Victim is a "habitual drug user of several narcotics . . . [and] regular user of marijuana," and that the Victim should be drug tested. In an apparent effort to establish his credibility, WALDMAN represented that he was an attorney and could be disbarred for making dishonest statements. He stated that his purpose of writing was to ensure that the Victim be "held to account for her illegal behaviors."

c. On or about September 9, 2014, using the same email account, drwesq@gmail.com, and signing his name "David Waldman," WALDMAN sent the Victim's employer's human resources department a third email, which accused the Victim of HIPAA violations.

The December 2014 Order of Protection Against WALDMAN

10. Based on my participation in this investigation, including my review of publicly available documents, I have learned, among other things, that on or about December 9, 2014, DAVID WALDMAN, the defendant, was charged with misdemeanor criminal contempt in the second degree and stalking in the fourth degree by the Manhattan District Attorney's Office in light of the emails and blog posts that followed the July 2014 temporary order of protection. The People of the State of New York v. David Waldman (2014NY02596353/ 204NY091426). On or about December 12, 2014, WALDMAN pled guilty to the contempt charge. The State Court sentenced WALDMAN to a program and a conditional discharge and entered a new order of protection, in effect until December 11, 2019. The order of protection prohibited WALDMAN from communicating with the Victim through electronic means.

The Harassing Blog Posts Targeting the Victim Continued

11. Based on my participation in this investigation, including reviewing documents and interviewing the Victim, I have learned, among other things:

a. DAVID WALDMAN, the defendant, continued to create harassing and threatening blog posts about the Victim in 2015, 2016, and 2017. Blogspot accounts controlled by WALDMAN, see ¶¶ 20-23, *infra*, were used to create a series of "blog

spot pages" targeting the Victim, including: "[first and last name of the Victim]recruiterslut.blogspot.com"; "robertromababylonandon.blogspot.com"; "thisis[first name and last name of the victim's boyfriend].blogspot.com"; and "executiverecruitingskank.blogspot.com." WALDMAN's blogs contained, among other things, photographs of the Victim, her first name, last name, place of employment, and other personal identifiers. The posts largely consisted of long, rambling tirades about the Victim, echoing many of the same themes in the email messages described above.

b. For example, on or about November 9, 2017, the "robertroma" blog had a post entitled "[Victim's name] executive talent acquisition lead for [bank where the Victim is employed] is as criminal as many of the [bank's] bankers," and another post entitled "I slept with executive recruiter [Victim's name] for four months. This is my story." The blog posts contained many of the same themes in WALDMAN's email messages, with a few new claims, e.g., that the Victim had been diagnosed with bipolar and narcissistic personality disorder, failed out of law school, and that she is a lesbian. WALDMAN's blog posts also included new threatening comments, e.g., "i certainly am not capable of wishing she were dead. that is beyond my abilities. or so I had thought. i now know differently."

c. On November 9, 2017, the "[first and last name of victim]recruiterslut" blog had a post that claimed that the Victim made false accusations against a family member of child sexual abuse and falsely accused an ex-boyfriend of domestic violence.

d. On or about November 7, 2017, the "executiverecruitingskank" blog had a post entitled "[Victim's name] executive recruiting slut" and a post from "Anton Phillippe Wolfgang Van Sertima V," which matches the name used in the harassing 2014 blog posts described above.

e. On or about November 19, 2017, the "thisis[first name and last name of the victim's boyfriend]" blog had posts entitled "[the Victim] gets away with being a slut," with similar claims that the Victim mistreated the blog poster, with copies of emails between the Victim and WALDMAN, and with photographs of the Victim. The namesake of the blog, is the name of the person the Victim began dating after WALDMAN and she broke up in spring 2014.

f. Throughout 2017, the "robertromababylonandon.blogspot.com" blog had posts targeted at the Victim.

Recent Threats to Kill, Rape, and Assault the Victim

12. Based on my participation in this investigation, including reviewing documents and interviewing the Victim, I have learned, among other things:

a. Beginning in February 2017, and continuing through May 2018, one or more individuals sent the Victim a series of threatening or otherwise harassing email messages using various email providers. For example, on or about February 26, 2017, using the email account anonymous@hoi-polloi.org, someone sent the Victim an email with the subject line "dirty jew." The message read:

[Y]ou are one of the meanest bitches i have ever heard about. [I] think chicks that play the victim card should die. [I] think women who accuse men of abuse should be tortured. [Y]ou should have a butcher knife fuck your pussy. [Y]ou even look mean. [Y]ou look like a reptile. [A]n ugly smirk. [P]ale as fuck. . . . [I] hate jews. [Y]ou and your jew family should die. [D]irty jews.

b. On or about October 7, 2017, using the name "Ingrid Rand," and the account irand@digitec.com.eu, an individual sent the Victim an email with the subject "online reading." The header of the email shows that it was actually sent using the anonymous e-mail service, "anonmousemail.me," which I recognize as an overseas email provider. The email stated, "ive not liked reading about you. [I] hate feminist dykes who hate men and play the victim. [Y]ou are worse even then gross whores. [I]t shouldnt [sic] matter of looks but i hate the uglies like you too. [I] think the best thing when it comes to you is that you be killed."

c. On or about October 8, 2017, using the name "Ingrid Rand," and the account irand@digitec.com, an individual sent the Victim an email with the subject line "ive [sic] watched you run." The header of the email shows that it was actually sent using the anonymous e-mail service, anonmousemail.me. It stated, "you look screwy. you stick your butt out and it looks strange. while you will be dead it is not

for the way you run even though i hate it. we are neighbors almost. the internet is large but the world is small."

d. On or about February 4, 2018, using the name "Jim Bottis," and the account sender@5ymail.com, an individual believed to be WALDMAN sent the Victim an email with the subject line "blog bitch." I recognize 5ymail as an overseas email provider. The email stated, "I have read two entire blogs, one of which is all about you and one is about you and also about random bullshit. I have learned that you are a nasty cunt and a whore. I normally like whores. But not you. You are ugly. Chicks like you should get beaten."

13. On or about May 7, 2018, using the name "Steve Wexler," and the account sender@5ymail.com, an individual sent the Victim an email stating, among other things, "You should be put down. Put down like a dog."

WALDMAN Controlled the Electronic Accounts

drwesq@gmail.com

14. As set forth in greater detail above, see ¶¶ 5(b)-5(c), 9(a)-9(c), *supra*, DAVID WALDMAN, the defendant, used the email account drwesq@gmail.com ("Account-1") to send harassing and threatening communications to the Victim and to send defamatory communications about the Victim to her employer in an apparent attempt to get her fired.

15. Based on records obtained from Google pursuant to a subpoena, I am aware that the subscriber of Account-1 listed the Waldman Cellphone Number as his contact telephone number. As noted above, WALDMAN used this same cellphone number to send the Victim harassing text messages. (See ¶¶ 5(d), 13(f), *supra*.)

16. The records obtained from Google also show that Account-1 had been logged into from a specific IP address³

³ Based on my training and experience, I know that "Internet Protocol address" or "IP address" refers to a unique number used by a computer to access the Internet. IP addresses can be dynamic, meaning that the Internet Service Provider ("ISP") assigns a different unique number to a computer every time it accesses the Internet. IP addresses might also be static, meaning an Investigative Software assigns a user's computer a

("Target IP Address-1") on numerous occasions. Based on records obtained from the internet service provider for Target IP Address-1, I am aware that the subscriber associated with Target IP Address-1 is "David Waldman" and the address associated with Target IP Address-1 is the home address of DAVID WALDMAN, the defendant.

drwaldmanesq@gmail.com

17. As set forth in greater detail in paragraph 5(i), *supra*, DAVID WALDMAN, the defendant, used the email address drwaldmanesq@gmail.com ("Account-2") to send harassing and threatening communications to the Victim. Based on records obtained from Google pursuant to a subpoena, I have learned, among other things, that Target IP Address-1 was used to log into Account-2 and the Waldman Cellphone Number is listed as the contact telephone number for the subscriber of Account-2.

Robertroma68@gmail.com

18. As set forth in greater detail in paragraph 7, *supra*, DAVID WALDMAN, the defendant, used the email address Robertroma68@gmail.com ("Account-3") to send harassing and threatening communications to the Victim. Based on records obtained from Google pursuant to a subpoena, I have learned, among other things, that Target IP Address-1 was used to log into Account-3 and the Waldman Cellphone Number is listed as the contact telephone number for the subscriber of Account-3.

Antonvansertima68@gmail.com

19. Based on my review of subscriber information obtained from Google pursuant to a subpoena, I have learned, among other things, that the email account antonvansertima68@gmail.com, ("Account-4") was listed as an alternate email for the blog spot account executiverecruitingskank.blogspot ("Account-5") which, in turn, was used to create harassing blogspot posts concerning the Victim, as set forth in greater detail in paragraphs 11(a) and (d), *supra*.

particular IP address that is used each time the computer accesses the Internet.

Robertromababylonandon.blogspot.com

20. As described in further detail in paragraphs 11(a) and (f), *supra*, DAVID WALDMAN, the defendant, used the blogspot account robertromababylonandon ("Account-6") to create harassing and threatening communications about the Victim. Based on my review of subscriber information for Account-6 that was obtained from Google pursuant to a Subpoena, I have learned, among other things, that the user of Account-6 listed robertroma68@gmail.com, Account-3, as an alternate account.

[Victim's first name and last name] recruiterslut.blogspot.com

21. As described in further detail in paragraphs 11(a) and (c), *supra*, DAVID WALDMAN, the defendant, used the blogspot account [the Victim's first name and last name] recruiterslut ("Account-7") to create harassing and threatening communications about the Victim. Based on my review of subscriber information for Account-7 that was obtained from Google pursuant to a Subpoena, I have learned, among other things, that the user of Account-7 listed robertroma68@gmail.com, Account-3, as an alternate account.

Thisis [the Victim's boyfriend's first and last name].blogspot.com

22. As described in further detail in paragraphs 11(a) and (e), *supra*, DAVID WALDMAN, the defendant, used the blogspot account Thisis [the Victim's boyfriend's first and last name].blogspot.com ("Account-8") to create harassing and threatening communications about the Victim. Based on my review of subscriber information for Account-8 that was obtained from Google pursuant to a Subpoena, I have learned, among other things, that the user of Account-8 listed robertroma68@gmail.com, Account-3, as an alternate account.

Executiverecruitingskank.blogspot.com

23. As described in further detail in paragraphs 11(a) and (d), *supra*, DAVID WALDMAN, the defendant, used the blogspot account executiverecruitingskank.blogspot.com, Account-5, to create harassing and threatening communications about the Victim. Based on my review of subscriber information for Account-5 that was obtained from Google pursuant to a Subpoena, I have learned, among other things, that the user of Account-5

listed robertromaa68@gmail.com, Account-3, as an alternate account.

WHEREFORE, the deponent respectfully requests that a warrant be issued for the arrest of DAVID WALDMAN, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



ANTHONY GIATTINO
Special Agent
United States Attorney's Office
Southern District of New York

Sworn to before me this
31 day of May, 2018



THE HONORABLE SARAH NETBURN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK